

May 17, 2005

Ms. Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

**RE: Massachusetts Electric Company and Nantucket Electric Company, D.T.E.
05-2**

Dear Ms. Cottrell:

Enclosed please find the Attorney General's First Set of Document and Information Requests in the above matter.

Sincerely,

Colleen McConnell
Assistant Attorney General

enclosure

cc: John Geary, Hearing Officer
Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Massachusetts Electric Company and
Nantucket Electric Company

)
)
)
)

D.T.E. 05-2

ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's First Set of Information Requests in the above captioned proceeding.

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Massachusetts Electric Company and/or Nantucket Electric Company (collectively, the "Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide 2 copies of all requested documents, even bulk responses. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. If the response contains attachments with confidential material and the cover sheet with the request is filed separately from the public filing, provide a copy of the cover sheet with the confidential attachment.
16. The term "Company" refers to Massachusetts Electric Company and Nantucket Electric Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please submit responses within 10 calendar days of receiving the request, as directed by the Hearing Officer in the Ground Rules.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

<hr/>)	
Massachusetts Electric Company and)	
Nantucket Electric Company)	D.T.E. 05-2
<hr/>)	

ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's FIRST SET of DISCOVERY in the above referenced docket.

- | | |
|--------|--|
| AG-1-1 | Refer to Exhibit TMB-2, p.3. Please provide copies of all invoices supporting the amounts that appear in the column "Default Service Bill." The invoices should be annotated to show the date and amount paid, and the amount of any disputes and adjustments. Include a summary schedule that ties each invoice to the amounts show on Exhibit TMB-2, p. 3. Explain all adjustments in excess of \$5,000 and the status of any disputes. |
| AG-1-2 | Refer to Exhibit TMB-2, p.3. Please provide copies of all invoices supporting the amounts that appear in the column "RPS Compliance." The invoices should be annotated to show the date and amount paid, and the amount of any disputes and adjustments. Include a summary schedule that ties each invoice to the amounts show on Exhibit TMB-2, p. 3. Explain all adjustments in excess of \$5,000 and the status of any disputes. Provide all supporting calculations, workpapers and assumptions that relate to the RPS Compliance costs as reported in Exh. TMB-2. |
| AG-1-3 | Refer to Exhibit TMB-2, p. 3. Please explain the basis for the amounts that appear in the column "Supplier Reallocations." Provide all supporting documentation. |
| AG-1-4 | Refer to Exhibit TMB-2, p. 2. Please provide the monthly "Total Default Service Revenue" broken down by customer class. Please identify and explain all adjustments or corrections in excess of \$5,000. |
| AG-1-5 | Please provide the monthly Default Service expense broken out by customer class. Compare this data to the default service revenues by class and explain any revenue/expense variances of more than 5% on a class basis. If the revenue and |

expense data needs to be realigned or lagged in any way to better illustrate variances that are not due to billing cycle differences, please provide all calculations, workpapers and assumptions related to the realignment.

- AG-1-6 Refer to Exhibit TMB-6. Please explain why the 2005 “Total GWhs” in Section II is different than the total GWh equivalent in TMB-5, p. 1 line (4) and why the Company believes it is appropriate to use the GWhs figure on TMB-6 for determining the transition charge.
- AG-1-7 Refer to Exhibit TMB-7. Please provide all invoices, bills, or other supporting documents (remittance advices, journal entries, cash transfers, etc.) related to the Contract Termination Charges appearing in all Columns (d). Explain all adjustments and corrections in excess of \$5,000.
- AG-1-8 Refer to Exhibit TMB-7, pp. 5 and 6. Please explain why there are no kWh Deliveries in January 2004 columns. Explain how the CTC charge for January 2004 was determined.
- AG-1-9 Please provide, on a total Company basis, the monthly kWh deliveries by class for the months October 2003 through October 2004.
- AG-1-10 Please provide, on a total Company basis, the monthly kWh sales by class for the months October 2003 through October 2004.
- AG-1-11 Refer to Exhibit TMB-11, p. 4. Please provide all invoices/bills supporting the “NEP Transmission Expense.” The invoices should be annotated to show the date and amount paid, and the amount of any disputes and adjustments. Include a summary schedule that ties each invoice to the amounts show on Exhibit TMB-4, p. 4. Explain all adjustments in excess of \$5,000 and the status of any disputes.
- AG-1-12 Refer to Exhibit TMB-11, p. 4. Please provide all invoices/bills supporting the “NEPOOL Transmission Expense.” The invoices should be annotated to show the date and amount paid, and the amount of any disputes and adjustments. Include a summary schedule that ties each invoice to the amounts show on Exhibit TMB-4, p. 4. Explain all adjustments in excess of \$5,000 and the status of any disputes.
- AG-1-13 Refer to Exhibit TMB-11, p. 4. Please provide all invoices/bills supporting the “ISO Transmission Expense.” The invoices should be annotated to show the date and amount paid, and the amount of any disputes and adjustments. Include a summary schedule that ties each invoice to the amounts show on Exhibit TMB-4, p. 4. Explain all adjustments in excess of \$5,000 and the status of any disputes.
- AG-1-14 Refer to Exhibit TMB-11, p. 4. Please provide all invoices/bills supporting the “Miscellaneous Transmission Expense.” The invoices should be annotated to

show the date and amount paid, and the amount of any disputes and adjustments. Include a summary schedule that ties each invoice to the amounts show on Exhibit TMB-4, p. 4. Explain all adjustments in excess of \$5,000 and the status of any disputes.

- AG-1-15 Refer to Exhibit CAC-1, p.1 of 3 (Bates page 212), column (2). Please provide copies of all workpapers and calculations supporting the NEP Non-PTF Demand Charge. Provide a copy of the tariff language that specifies the calculations provided.
- AG-1-16 Refer to Exhibit CAC-1, p.1 of 3 (Bates page 212), column (3). Please provide copies of all workpapers and calculations supporting the NEP Scheduling and Dispatch costs. Provide a copy of the tariff language that specifies the calculations provided.
- AG-1-17 Refer to Exhibit CAC-1, p.1 of 3 (Bates page 212), column (6). Please provide copies of all workpapers and calculations supporting the NEP Transformer Surcharge. Provide a copy of the tariff language that specifies the calculations provided.
- AG-1-18 Refer to Exhibit CAC-1, p.1 of 3 (Bates page 212), column (8). Please provide copies of all workpapers and calculations supporting the NEP Meter Surcharge. Provide a copy of the tariff language that specifies the calculations provided.
- AG-1-19 Refer to Exhibit CAC-1, p.1 of 3 (Bates page 212), column (4). Please provide copies of all invoices supporting the NEP 3rd Party Support Payments. Please identify the FERC Account numbers in which these expenses are recorded. Provide a copy of the tariff language that specifies that these cost are allowable in NEP's transmission rates.
- AG-1-20 Refer to Exhibit CAC-1, p.1 of 3 (Bates page 212), column (5). Please provide copies of all invoices, workpapers and calculations supporting the supporting the NEP Generation in Support of Transmission costs. Please identify the FERC Account numbers in which these costs are recorded. Provide a copy of the tariff language that specifies the calculations provided and that these costs are allowable in NEP's transmission rates.
- AG-1-21 Refer to Workpaper CAC-1, p. 1, line 4. Please explain why the RNS rate increases on 3/1/05 due to a change in the "bandwidth." If the increase reflects increased costs, please provide workpapers and calculations supporting the estimated rates.
- AG-1-22 Refer to Workpaper CAC-1, pp. 4-6 of 6 (Bates pages 219-221). Please explain what the charges on these pages represent and how they were determined. Are these costs billed to MECo by NEP, Boston Edison, Northeast Utilities or some

other entities? Explain the footnotes.

- AG-1-23 Refer to Testimony of Carol A. Currier, page 19 of 21, lines 3-8. Please expand on the testimony and explain why “historic expense data” was lower in relation to actual expenses incurred. If the revenue credit is based on revenues earned/billed in a time period different other than the time period the NEP costs are billed to the Company, shouldn’t the Company synchronize the billing periods? How would the Company accomplish such synchronization if order by the Department?
- AG-1-24 Refer to Testimony of Carol A. Currier, page 18. Please explain the calculation changes that are the basis for the approximately \$0.47 million increase in NEP Scheduling and Dispatching charges. Provide a redlined copy of the related tariff changes.
- AG-1-25 Refer to the Testimony of Theresa M. Burns, p. 12, lines 4-5, please provide NEP’s and Montaup’s annual CTC reconciliation account report that was filed at the Department on November 24, 2004.

Date: May 17, 2005

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

_____)	
Massachusetts Electric Company and)	
Nantucket Electric Company)	D.T.E. 05-2
_____)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon each person on the service list compiled by the Secretary in D.T.E. 05-2. Dated at Boston this 17th day of May, 2005.

Colleen McConnell
Assistant Attorney General
Office of the Attorney General
Utilities Division
One Ashburton Place
Boston, MA 02108
(617) 727-2200